



UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Office of the Director
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October 1, 2021

To: James Tucker
Chair
National Advisory Committee

From: Ron S. Jarmin
Acting Director
U.S. Census Bureau

Subject: Recommendations and Comments to the U.S. Census Bureau from the
National Advisory Committee Spring 2021 Meeting

The U.S. Census Bureau thanks the National Advisory Committee for its recommendations. We are responding to the committee recommendations submitted during its 2021 Spring Virtual Meeting on May 6-7, 2021.

Your feedback is welcomed to ensure that the Census Bureau continues to provide relevant and timely statistics used by federal, state, and local governments, as well as business and industry, in an increasingly technologically oriented society.

Attachment

To: Ron S. Jarmin
Acting Director
U.S. Census Bureau

From: James Tucker
National Advisory Committee (NAC) Chair

Subject: Recommendations and Comments to the Census Bureau from the National
Advisory Committee – Spring 2021 Meeting May 6 & 7, 2021

I. **NAC Administrative Recommendations**

Paragraph 9 of the NAC’S Charter provides, “The Committee will meet at least twice per year.” The NAC has not met since Fall 2019. The two NAC meetings scheduled in 2020 were cancelled despite the critical need for the NAC’s input on changes made during the 2020decennial Census, many of which were not planned or tested. In contrast, the CSAC met three times in 2020.

1. RECOMMENDATION: The NAC recommends that the terms of all active NAC members serving as of October 2, 2020 be extended for a period of one year to account for the year in which the NAC was inoperative as a federal advisory committee in violation of its Charter.

Census Bureau Response: The Census Bureau rejects this recommendation. Please note, while the Census Bureau appreciates the contributions of each member in support of our mission – to serve as the nation’s leading provider of quality data about its people and economy – our work is governed by the Federal Advisory Committee Act (FACA).

Under FACA, the Committee Charter serves as an integral document, outlining the functional and operational aspects of its work. The Secretary of Commerce, in the charter for the Census National Advisory Committee on Racial, Ethnic and Other Populations (NAC) specifies the following:

Members are appointed for a term not-to-exceed three years.

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- Members may be reappointed, for one additional term, at the discretion of the Census Bureau Director.
- Members who have served two consecutive terms must wait three years before reappointment consideration.

Once expired, individuals may continue to contribute to the work of the Advisory Committee by submitting public comments during our public Spring and Fall Meetings and may serve as external subject-matter-experts on Working Groups.

2. RECOMMENDATION: The NAC recommends that its Fall 2021 meeting be held on November 4-5, 2021.

Census Bureau Response: The Census Bureau accepts this recommendation.

The Census Bureau's cancellation of all NAC meetings in 2020 prevented NAC members and the partners, communities of color and other hard to count population groups they represent from providing the Bureau with feedback on their experience with 2020 Census operations, changes to those operations due to the pandemic, and associated recommendations. This feedback is critical to assist the Census Bureau in updating its operational contingency plans, to prepare for the 2030 decennial Census and to improve the data collection operations and communications for the Bureau's other annual and periodic survey programs including the ACS.

3. RECOMMENDATION: The NAC recommends that the Census Bureau charter a NAC working group to provide feedback from the 2020 Census and recommendations to improve future survey operations and planning for the 2030 Census for Hard-To-Count limited-English proficient, racial and ethnic populations. The working group should be chartered through 2022, provide deliverables at future NAC meetings, and produce a final written report and recommendations.

Census Bureau Response: The Census Bureau acknowledges this recommendation and will take it into consideration once all Decennial and Post-Enumeration Survey operations are complete.

4. RECOMMENDATION: From 2016 to 2020 the NAC chartered an Undercount of Young Children Workgroup. The NAC recommends that the Census Bureau renew the charter and extend it to apply to all of the demographic surveys. This group will provide recommendations to improve data collection for children across demographic surveys (Decennial Census, American Community Survey, Current Population Survey, etc.).

Census Bureau Response: The Census Bureau acknowledges this recommendation and will take it into consideration. We appreciate the efforts and input of the NAC Undercount of Young Children Workgroup. We are committed to continuing to improve data collection

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for children in the decennial census, the American Community Survey, the Current Population Survey, and other surveys conducted by the Census Bureau.

These past few years has brought about a politicization of the Census data collection. There is a need to examine the effect of this politicization on the 2020 Census and implications for the 2030 Census and other Census surveys. This examination should include a comprehensive and robust communication strategy focused on the outreach, messaging, and transparency to proactively communicate to the public about post-processing and data quality. Furthermore, it should assess the damage that has been done to the Census and Bureau and evaluate the level of trust the U.S. public and population subgroups have in the Census as a neutral government entity in order to develop a baseline view of the Census and the Bureau. This will identify gaps in public trust. A NAC subcommittee performing these tasks would work with the Bureau to restore the image and reputation of the decennial Census and the Bureau as a neutral government entity that is insulated from politicization.

5. RECOMMENDATION: The NAC recommends the creation of a new NAC subcommittee to address the politicization of the Census and increasing public engagement to focus on the importance of accurate data.

Census Bureau Response: The Census Bureau acknowledges this recommendation and will take it into consideration.

6. RECOMMENDATION: The NAC recommends that the Census Bureau establish an Administrative Records and Imputation Working Group.

Census Bureau Response: The Census Bureau will consider this recommendation. We appreciate the efforts and input of the NAC as it relates to the use of administration records both as data inputs and imputation strategies. We continue to strive to develop cutting-edge methodologies that more efficiently and effectively make use of administrative records and hope to continue to engage with NAC around these efforts for the 2030 decennial census, the American Community Survey, the Current Population Survey, and other surveys conducted by the Census Bureau.

7. RECOMMENDATION: The NAC recommends that the Fall 2021 NAC meeting include a presentation and discussion of the OMB decision on race categories, future plans on race categories for 2030 Census, as well as the implications of reporting on 63+ race categories.

Census Bureau Response: The Census Bureau accepts the National Advisory Committee's recommendation for the Fall 2021 NAC meeting to include a presentation and discussion on the race and ethnicity categories. We look forward to the opportunity to summarize the experience the Census Bureau has with researching improvements to the questions on race and ethnicity, and what we have learned from the 2020 Census results.

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The Census Bureau follows the race and ethnicity standards set by the U.S. Office of Management and Budget (OMB). A decision has not been made by the OMB on revising the 1997 standards, which were in place for the 2020 Census. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our colleagues at OMB and Federal statistical agencies on areas of research as we prepare for the 2030 Census and future demographic surveys which collect information on race and ethnicity.

8. **RECOMMENDATION:** The NAC recommends that at the Fall 2021 NAC meeting that the Census Bureau provide the NAC with an update on 2020 Census data quality indicators, including the PES, for the undercount of young children, children of color, communities of color, and low-income families, as well as the potential overcount of non-Hispanic White families and higher income families.

Census Bureau Response: The Census Bureau accepts this recommendation. We welcome the opportunity to provide an update on the progress of the Post-Enumeration Survey at the fall 2021 NAC meeting. There are no plans to present an update on quality indicators at the fall 2021 NAC meeting, but additional quality indicators will be reported in the future.

9. **RECOMMENDATION:** The NAC recommends that the Census Bureau include in the Fall 2021 NAC meeting agenda a discussion of the enumeration of Sexual Orientation and Gender Identity (SOGI) in Census surveys including the 2030 Census, ACS and other periodic and annual surveys.

Census Bureau Response: The Census Bureau accepts the National Advisory Committee's recommendation for the Fall 2021 NAC meeting to include a discussion of sexual orientation and gender identity (SOGI). Gender identity and sexual orientation are topics of growing interest to the public, data users, and policy makers. We look forward to the opportunity to summarize the experience the Census Bureau has with researching and fielding SOGI questions on surveys, provide information about the process for adding questions to Census Bureau surveys, and discuss SOGI measurement with the NAC.

In his opening remarks, Interim Director Ron Jarmin mentioned the Bureau's efforts to transform and modernize its data collection methods and overall operations.

10. **RECOMMENDATION:** The NAC recommends that at a future NAC meeting, the Bureau present the work being done to modernize and transform its operations and explain in what ways the NAC and other stakeholders can inform the Bureau's future data collection strategies.

Census Bureau Response: The Census Bureau accepts this recommendation.

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II. General Recommendations on Race and Ethnicity

OMB's Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity were last revised in 1997 [62 Fed. Reg. 58782 (Oct. 30, 1997)] and are available at <https://www.federalregister.gov/documents/1997/10/30/97-28653/revisions-to-the-standards-for-the-classification-of-federal-data-on-race-and-ethnicity>. Those standards need to be updated to more accurately reflect race and ethnicity, indigenous peoples, sexual orientation and gender identity (SOGI).

11. RECOMMENDATION: The NAC recommends that the Census Bureau coordinate with OMB to commence a new notice and comment period on the race and ethnicity standards for the purpose of modernizing those standards to more accurately reflect race and ethnicity, indigenous peoples, sexual orientation and gender identity (SOGI). Comments submitted during previous Federal Register notices on the OMB Race and Ethnicity Standards also should be considered.

Census Bureau Response: The Census Bureau appreciates the recommendation from the National Advisory Committee. We remain committed to improving the accuracy and reliability of census results by researching approaches that more accurately measure and reflect how people self-identify.

The Census Bureau follows the race and ethnicity standards set by the U.S. Office of Management and Budget (OMB). A decision has not been made by the OMB on revising the 1997 standards, which were in place for the 2020 Census. The process for reviewing the standards on race and ethnicity is determined by the OMB. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our colleagues at OMB and Federal statistical agencies on areas of research as we prepare for the 2030 Census and future demographic surveys which collect information on race and ethnicity.

Gender identity and sexual orientation are topics of growing interest to the public, data users, and policy makers. We collect some information on these topics, primarily in surveys we conduct for other agencies. We added SOGI (Sexual Orientation and Gender Identity) questions to the Household Pulse Survey in late July. The questions were added to get a better idea of COVID-19's impact on Sexual and Gender Minority (SGM) populations. The Census Bureau will continue to partner with other federal agencies, including other statistical agencies and the Office of Management and Budget, to determine how best to measure these topics. We will also continue to engage with stakeholder groups and provide the public with the opportunity to comment on our work.

The OMB conducted an extensive review prior to the 2020 Census of designating a new ethnicity category for persons from the Middle East and North Africa (MENA) region,

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persons who identify with various races. It was tested by the Bureau, found to have improved data accuracy on this population, but abandoned during the last Administration.

12. RECOMMENDATION: The NAC recommends that the Census Bureau work with the OMB to authorize the inclusion of a MENA category as an ethnicity in the 2030 Census.

The Census Bureau appreciates the recommendation from the National Advisory Committee. We remain committed to improving the accuracy and reliability of census results by researching approaches that more accurately measure and reflect how people self-identify, including people of Middle Eastern and North African (MENA) heritage. We understand and support the critical need for providing data for the MENA population from the decennial census. The Census Bureau is currently developing the plans for 2020 Census data products, including producing data for the very first time for detailed MENA groups such as Lebanese, Saudi Arabian, Egyptian, Moroccan, etc. As this important work continues, we will be communicating the plans for 2020 Census data products with the public.

The Census Bureau follows the race and ethnicity standards set by the U.S. Office of Management and Budget (OMB). A decision has not been made by the OMB on revising the 1997 standards, which were in place for the 2020 Census. The process for reviewing the standards on race and ethnicity is determined by the OMB. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our colleagues at OMB and Federal statistical agencies on areas of research as we prepare for the 2030 Census and future demographic surveys which collect information on race and ethnicity.

Census surveys (including the 2020 Census form and the current 2021 ACS survey form) include an instruction for the race question that simply states, “Mark one or more boxes AND print origins.” That instruction fails to adequately explain to respondents who are of mixed-race or multiple races the circumstances under which they may want to check more than one box, nor does it explain the ramifications of doing so.

13. RECOMMENDATION: The NAC recommends that the Census Bureau improve the instruction on mixed-race or of multiple races to better inform respondents how they may answer the race question on Census surveys and test that instruction with partners and organizations working with communities of color.

Census Bureau Response: The Census Bureau appreciates the recommendation from the National Advisory Committee. We remain committed to improving the accuracy and reliability of census results by researching approaches that more accurately measure and reflect how people self-identify. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our

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colleagues at OMB and Federal statistical agencies on areas of research as we prepare for the 2030 Census and future demographic surveys which collect information on race and ethnicity.

14. RECOMMENDATION: The NAC recommends that future research on race and ethnicity include examining the replacement of the term “Hispanic” in favor of the word “Latino.” Census Research should include ethnographic analysis, focus groups and survey/methodological assessments. Alternatively, the terms “Hispanic” should be added after the term “Latinos.”

Census Bureau Response: The Census Bureau appreciates the recommendation from the National Advisory Committee. The Census Bureau follows the race and ethnicity standards set by the U.S. Office of Management and Budget (OMB), which mandates the use of the ‘Hispanic’ term when defining the Hispanic and Non-Hispanic populations in the United States. A decision has not been made by the OMB on revising the 1997 standards, which were in place for the 2020 Census. We remain committed to improving the accuracy and reliability of census results by researching approaches that more accurately measure and reflect how people self-identify. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our colleagues at OMB and Federal statistical agencies on potential new areas for future research.

III. 2020 Census Operational Overview

The Census Bureau cancelled the planned 2017 Field Tests on the Colville and Standing Rock Reservations and in Puerto Rico, which were to include testing on reaching households with non-traditional mailing addresses (such as Highway Contract Route and Rural Route addresses, Post Office boxes, and households that may only be located through GPS coordinates or geographic descriptions). The Bureau announced plans to possibly reschedule those Field Tests, which never occurred. During the 2020 Census, the only mailing from the Census Bureau to households with non-traditional mailing addresses was a single postcard sent between June 24, 2020 and July 3, 2020 to 1.3 million post office boxes in communities in which all mail is delivered by post office boxes.

15. RECOMMENDATION: The NAC recommends the Census Bureau conduct field tests to resolve methods of communicating with and surveying households with non-traditional mailing addresses for the decennial Census and all other periodic and annual surveys.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

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During the 2020 Census, partners fielded complaints about the Census Bureau's recruitment process for part-time and full-time workers including: lack of broadband access in remote and rural areas preventing submission of applications and checking application status; lengthy delays between the time applicants applied and when they were notified they were hired; infrequent and inadequate communications from the Census Bureau about applicants' status; and rapidly evolving operational and field conditions impacting applicants' decisions on whether to accept employment with the Census Bureau. Partners have received similar complaints about the hiring process for workers for other annual and periodic survey programs. These issues have contributed to staffing shortfalls prevalent in many of the hardest to count communities.

16. RECOMMENDATION: The NAC recommends that the Census Bureau streamline the timeline from when applicants are recruited, hired and onboarded and provide more regular communications with applicants about the status of their application and operational requirements, using methods of communication other than broadband and e-mail where necessary.

Census Bureau Response: [The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.](#)

During the 2020 Census, partners received complaints that the explanation of "Person 1" uses a sexist, gender-biased and culturally inappropriate definition that emphasizes "someone living here who pays the rent or owns this residence." Similarly, the principal definition for "Person 1" in the 2021 ACS survey is "the person living or staying here in whose name this house or apartment is owned, being bought, or rented." In many cultures and communities of color, the head of household does not "pay the rent" or "own the residence." Rather, the head of household may be the spiritual leader of the residence, a tribal Elder living with his or her children, or the person who makes the daily decisions for those living in the residence. Ownership of the residence or who pays rent improperly emphasizes an economic position that often bears no relationship to the reality of who respondents identify as the head of household.

The instruction also fails to explain that how the question is answered has implications for the Indian housing federal block grant funding formula.

17. RECOMMENDATION: The NAC recommends that the Census Bureau change its instructions for identification of "Person 1" to be culturally appropriate for all population groups, without unduly emphasizing economic or gender status that many groups do not consider to be an appropriate means of identifying the head of household.

Census Bureau Response: [The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.](#)

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18. RECOMMENDATION: The NAC recommends that the Census Bureau establish a pilot program which includes technical assistance for the American Community Survey allowing Tribal officials to serve as Title 13 enumerators for surveys on reservations and tribal areas, including off-reservation trust lands. If successful, the pilot program should be expanded for the 2030 Census.

Census Bureau Response: The Census Bureau accepts the recommendation. ACS cases in select tribal areas would make a good pilot that could be rolled out for ACS, other surveys, and the 2030 Census.

During the modern Census, decennial counts have commenced approximately six weeks early through Remote Alaska operations that count geographically remote and linguistically isolated Alaska Native villages. Many American Indian tribal areas in other states and households for other populations are located in geographically remote, isolated and/or linguistically isolated areas and often have been designated as Update Enumerate or Update Leave areas. Because those communities frequently include some of the hardest to count households, they would benefit from the early enumeration like the Remote Alaska operations. The pandemic during the 2020 Census operations left many of these households with little, or no time to respond to the Census because of the challenges reaching them under the shortened field schedules.

19. RECOMMENDATION: The NAC recommends that the Census Bureau begin all of its Update Enumerate and Update Leave field operations at least six weeks before the self-response period opens for the 2030 Census.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

20. RECOMMENDATION: The NAC recommends that the Census Bureau improve its media buys for its decennial, annual and periodic surveys that are directed at sheltered, homeless, and transient populations through increased ads more likely to reach those communities, such as billboards and busboards.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

21. RECOMMENDATION: The NAC recommends that the Census Bureau improve its asset-mapping of local media outlets, especially those serving hard-to-count populations.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

Due to operational changes resulting from the COVID-19 pandemic, directives from

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Administration appointees, and court orders, during the 2020 Census the Census Bureau issued untested messaging that was confusing, promoted narratives in support of litigation positions, and stated new timelines that often changed again in a matter of days. These problems were compounded by the overuse of acronyms, jargon and technical terms like “cases closed” during Non-Response Follow-up that confused and misled partners and members of the public. The Bureau’s messaging was disseminated not only through press releases to the media, but also through enumerators and partnership specialists in local ACOs. The Bureau’s confusing messaging caused some partners to inadvertently stop their Get-Out-The-Count efforts because they were erroneously led to believe that their entire community had responded to the Census or that the Census self-response period had ended.

22. RECOMMENDATION: The NAC recommends that the Census Bureau timely communicate information about changes to its field operations in plain language that has been tested with impacted communities in a manner that best promotes self-responses.

Census Bureau Response: The Census Bureau accepts this recommendation and will work to ensure that operational messaging is tested with intended audience(s) to make sure it is clear, understandable, and promotes the action intended.

23. RECOMMENDATION: The NAC recommends that the Census Bureau’s contingency planning for the 2030 Census and other annual and periodic surveys determine how households with non-traditional mailing addresses or those households lacking broadband or telephone access will be contacted and surveyed if no in-person activities can be conducted.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

24. RECOMMENDATION: The NAC recommends that the Census Bureau include in the End-To-End test (the dress rehearsal for the decennial Census) simulations of highly disruptive contingencies, such as a pandemic, civil unrest, acts of nature, or a terrorist incident, to minimize the recurrence of what happened in the 2020 Census, when many untested operational changes were made in response to the global pandemic.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

25. RECOMMENDATION: The NAC recommends that the Census Bureau improve its contingency planning by partnering with other federal agencies that respond to emergencies (such as FEMA), private entities like the Red Cross, and organizations representing Hard-To-Count populations and communities of color in the development of those plans.

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Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

26. RECOMMENDATION: The NAC recommends that the Census Bureau use messaging and recruitment methods for its decennial, periodic and annual surveys that are more culturally appropriate for communities of color.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

27. RECOMMENDATION: The NAC recommends that the Census Bureau improve and expand upon its Tribal Partnership Specialist program by making it an evergreen program that establishes a pool of permanent full-time Partnership Specialists for the AIAN population and other Hard-To-Count populations. The Partnership Specialist Program should be available for all Census surveys, including for the American Community Survey and other periodic and annual surveys.

Census Bureau Response: The Census Bureau accepts this recommendation for insertion into its 2020 Census lessons learned, which will be used for 2030 Census planning. Other current survey programs can source this for their own planning purposes.

The challenges around undercounting children, and particularly children of color, is found across a range of demographic products at the Census Bureau, and systematically addressing the problem requires that all parts of the Bureau be enlisted as part of the effort in a coordinated way. These challenges could be addressed through an individual who would develop a strategy and ensure efforts to count children are a priority across all data products and departments (operations, partnerships, communications, research). This individual/central point of contact needs to be identified now. They need to be engaged in the development, implementation, and analyses of surveys and in any early planning conversations taking place for the 2030 Census.

28. RECOMMENDATION: The NAC recommends that the Census Bureau appoint a senior staffer to coordinate and oversee efforts to more accurately count young children for all demographic surveys, administrative records, population estimates and other data activities.

Census Bureau Response: The Census Bureau acknowledges this recommendation and will take it into consideration. The Census Bureau remains committed to accurately counting young children in all our efforts including in our demographic surveys, in our pursuit and use of administrative records sources, in our population estimates, and other data activities. We will leverage, learn from, and build upon efforts implemented to date to improve the count of young children.

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IV. Post Data Collection Processing Status and 2020 Census Data Quality

Methods that the Census Bureau uses to identify persons not counted in the 2020 Census do not adequately account for those facing housing instability but not using services for the homeless. This barrier to securing an accurate and complete count was exacerbated during decennial Census operations because respondents were asked to identify itinerant persons in their household present on April 1, 2020, often several months before households completed their survey. Existing resources used to evaluate data quality are insufficient to identify these hardest to count individuals, sometimes called “couch surfers,” who often are friends, relatives or acquaintances who stay for a very short time.

29. RECOMMENDATION: The NAC recommends that the Census Bureau supplement its 2020 Census data quality review with records obtained from tribal governments, national organizations and other partners to evaluate the accuracy of population counts from communities of color with high levels of housing instability.

Census Bureau Response: The Census Bureau thanks the NAC for this recommendation and will consider it during the ongoing review of the 2020 Census and when planning for the review of the 2030 Census. The review of the 2020 production Census data files during post processing has concluded. However, as we continue with our efforts to assess the quality of the 2020 Census we will consider the use of additional data source such as those mentioned in the recommendation.

There are also various assessments planned to help us develop an understanding of the effectiveness of the efforts made to improve coverage of different demographic groups. The Census Bureau will also be providing assessments of coverage from Demographic Analysis and the Post-Enumeration Survey.

The Bureau made significant changes in how it counted young children in 2020, for which the NAC commends them. Yet it is important to assess what worked and what didn't work. This is important for all of the Bureau's demographic products and surveys since they all undercount young children.

30. RECOMMENDATION: The NAC recommends that the Bureau assess and report to the NAC the quality of the 2020 Census in terms of the undercount for sub-groups, including children as well as racial and ethnic groups/subgroups that are often undercounted. This should include a breakdown at the state and substate levels, and work to assess the undercount of a broader range of racial and ethnic groups (beyond Black and Latinx). [NOTE: this recommendation is relevant for other groups interested in the undercount of racial and ethnic groups.]

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Census Bureau Response: The Census Bureau appreciates the Committee's support and interest in the quality of the 2020 Census and partially accepts this recommendation. To fully assess the feasibility of this recommendation, the Census Bureau requires a comprehensive understanding from the Committee on the metrics and subgroups of interest. With such an understanding, the Census Bureau can determine which tabulations are feasible. Also of note, the 2020 Census Evaluations and Operational Assessments may provide data of interest at the national level, and the 2020 Census Post-Enumeration Survey will produce measures of coverage error for demographic groups and geographic areas.

31. RECOMMENDATION: The NAC recommends that the Bureau conduct a thorough evaluation of the efforts to count young children in the 2020 Census to assess what worked and didn't. Efforts should include evaluation of the effectiveness of the Every Door Direct Mailer, the communications campaign, coverage improvement efforts, and whether administrative records is an effective method to count young children in households that did not self-respond and that were not captured through NRFU.

Census Bureau Response: The Census Bureau accepts this recommendation with limitations. The 2020 Census has a robust Evaluations and Assessments program. As part of that program, dozens of assessment reports will be written describing how well various aspects of the 2020 Census achieved its goals and will include details on changes that were necessary during the 2020 Census. However, many efforts to improve the count of young children were integrated with other efforts. As such, it may be impossible to assess the impact individual efforts had on the count of young children.

The Census Bureau will continue to research and develop new ways to reduce coverage error for young children.

32. RECOMMENDATION: The NAC recommends that the Bureau include in any evaluations or testing of demographic products (such as the ACS Methods Test Panel) and in any planning for the 2030 Census: a) a survey of parents to assess how well families understand whether they should count their young children; b) testing of which new language/terms (i.e. including infants, newborns, toddlers, and preschoolers) work best to ensure that respondents count their young children; and c) testing different strategies for rostering questions given that nearly 20 percent of respondents do not realize they should report their young children.

Census Bureau Response: The Census Bureau accepts the recommendation. For some time before the 2020 Census, work was underway that directly addressed this topic in the form of a dedicated internal task force, which was focused on improving the count of young children. Recommendations from the task force fed into a proposal to test modified roster questions for the ACS. The topic of rostering household members will be included in the upcoming 2022 ACS Content Test. Staff from across the Census Bureau,

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including members of the task force and decennial staff, as well as staff from other federal agencies, are providing their expertise and prior research experience to develop and test new rostering questions. The new rostering questions will include specific probes directed at the omission of children. The team has also discussed possible future research in the use of administrative data to identify missing household members (such as young children) and improve household roster counts.

In addition to the 2022 ACS Content Test, the Census Bureau will be applying knowledge gained from the Post-Enumeration Survey (PES) and 2020 Census efforts related to counting young children. The results of these efforts will be shared across demographic surveys from the Census Bureau ACS and Demographic Research Group as well as various research seminars.

All findings from these avenues of research will be considered as we plan the 2030 Census.

The Census Bureau looks forward to continued work in this area.

33. RECOMMENDATION: The NAC recommends that the Census Bureau use the lessons learned from their young children evaluations to support more accurate data collection on children, and particularly children of color, for all of their demographic products.

Census Bureau Response: The Census Bureau accepts the recommendation to apply lessons from the 2020 Census efforts to improve the count of young children in the ACS, as well as other surveys. For some time before the 2020 Census, work was underway that directly addressed this topic in the form of a dedicated internal task force, which was focused on improving the count of young children. Recommendations from the task force fed into a proposal to test modified roster questions for the ACS. The topic of rostering household members will be included in the upcoming 2022 ACS Content Test. Staff from across the Census Bureau, including members of the task force and decennial staff, as well as staff from other federal agencies, are providing their expertise and prior research experience to develop and test new rostering questions. The new rostering questions will include specific probes directed at the omission of children. The team has also discussed possible future research in the use of administrative data to identify missing household members (such as young children) and improve household roster counts.

In addition to the 2022 ACS Content Test, the Census Bureau will be applying knowledge gained from the Post-Enumeration Survey (PES) and 2020 Census efforts related to counting young children. The results of these efforts will be shared across demographic surveys from the Census Bureau ACS and Demographic Research Group as well as various research seminars. All findings from these avenues of research will be considered as we begin our planning for the 2030 Census.

The Census Bureau looks forward to continued work in this area.

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34. RECOMMENDATION: The NAC recommends that the Census Bureau conduct evaluations for hard to count communities, such as young children and other historically undercounted populations, with the assistance of community organizations as appropriate.

Census Bureau Response: The Census Bureau accepts this recommendation. We will consider this as we plan future research and develop new ways to reduce coverage error in hard-to-count communities.

Most of the operational measures that the Bureau uses to measure success focus on household response rates. Unfortunately, these measures do not provide a picture of how accurately the Bureau captures the number of individuals living in the household. For example, data show that 1 in 5 low-income parents would not include their young children when responding to the Census. Current operational metrics mask people missed in the household (i.e. young children, doubled up families, couch surfers).

35. RECOMMENDATION: The NAC recommends that the Bureau develop operational measures that go beyond household response rates. Operational success measures should capture the completeness of the household response including the actual number of individuals living in the household.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

36. RECOMMENDATION: The NAC recommends that the Bureau identify those communities that need particular attention when it comes to explaining data accuracy and data quality, including post-processing operations, as part of proactive outreach to the public and data users designed to restore trust in the census data products and the Bureau.

Census Bureau Response: The Census Bureau accepts this recommendation and has already begun having these conversations with stakeholders as part of the release of 2020 Census results. We find especially useful external community feedback in addition to our own identification and evaluation and will rely on NAC to be one source of such identification.

37. RECOMMENDATION: The NAC recommends that the Bureau improve transparency and data aggregation relating to characteristic imputation, including frequency and sources, and conduct public demonstrations and outreach to specific communities to explain imputation and its effect on data accuracy and data quality.

Census Bureau Response: The Census Bureau accepts this recommendation. We strive for transparency in our work and understand the need to share information and results

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related to characteristic imputation. In the July/August 2021 timeframe, the Census Bureau will release a blog describing the characteristic imputation process. A report detailing the 2020 Census characteristic imputation results is scheduled for public release in summer 2022.

38. RECOMMENDATION: The NAC recommends that the Bureau provide transparent data about nonresponses and a comparison of nonresponses between 2020 and previous censuses, including information on how data varies across racial and ethnic groups and subgroups.

Census Bureau Response: The Census Bureau partially accepts this recommendation. Operational quality metrics released to date have included national- and state-level data on key components from the 2020 Census Nonresponse Followup operation as well as comparable data from the 2010 Census. An operational assessment of the 2020 Census Nonresponse Followup operation is in development. The operational assessment will include operational data by standard demographic categories. If data beyond those provided are desired, further discussion to assess the request and feasibility of meeting the request would be necessary.

39. RECOMMENDATION: The NAC recommends that the Bureau assess and report 2020 Census data relating to overcounts for sub-groups, including by racial and ethnic groups that are often overcounted. These should breakdown at the state and political subdivision levels, and work to assess the overcount of a broader range of racial and ethnic groups.

Census Bureau Response: The Census Bureau appreciates the Committee's support and interest in the quality of the 2020 Census and partially accepts this recommendation. To fully assess the feasibility of this recommendation, the Census Bureau requires a comprehensive understanding from the Committee on the metrics and subgroups of interest. With such an understanding, the Census Bureau can determine which tabulations are feasible. Also, of note, the 2020 Census Evaluations and Operational Assessments may provide data of interest at the national level and the 2020 Census Post-Enumeration Survey will produce measures of coverage error for demographic groups and geographic areas.

40. RECOMMENDATION: The NAC recommends that the Bureau provide transparent and proactive communications to the public regarding post-processing, including iterative nature of census operations, as a way of building back trust with the Census and the rigor that goes into the data products.

Census Bureau Response: The Census Bureau accepts this recommendation as we are always striving to provide transparent and timely communications about our data.

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41. RECOMMENDATION: The NAC recommends that the Bureau should, to the greatest extent possible, release to the public data and findings on 2020 Census Quality and 2020 Characteristic Imputation disaggregated by race/ ethnicity and identifying specific effects on young children.

Census Bureau Response: The Census Bureau partially accepts this recommendation. We strive for transparency in our work and understand the need to share information and results related to 2020 Census quality and characteristic imputation. To date, the Census Bureau has released operational quality metrics at the national and state level for a number of variables of interest. In the July/August 2021 timeframe, the Census Bureau will release a blog describing the characteristic imputation process. A report detailing the 2020 Census characteristic imputation results is scheduled for public release in summer 2022. However, the disaggregation by race/ethnicity and the identification of effects on young children are not within the scope of the report.

V. **Use of Administrative Records and Proxy Interviews**

The Bureau needs to evaluate the quality of using administrative data in capturing new babies, doubled up families, and other groups that are likely to be undercounted in administrative data, to assess whether the quality of these data vary across racial and ethnic groups and sub-groups, and assess whether the quality of these data vary across states and substate areas.

42. RECOMMENDATION: The NAC recommends that the Bureau evaluate the use of administrative records to enumerate households for the purposes identified above.

Census Bureau Response: The Census Bureau acknowledges this recommendation. The Bureau has been rigorously testing the use of administrative records both for finding hard-to-reach individuals as well as for conducting a full count enumeration in two recent projects developed under the Decennial Census Program for Experiments (CPEX). Included in those projects are analysis and summaries of the quality of data on young children (including those under one year old) and other undercounted groups. We look forward to sharing the results of this work with NAC at a future date.

43. RECOMMENDATION: The NAC recommends the Bureau only use administrative records to *supplement* self-response and non-response follow-up. Admin records should not be used to replace these strategies.

Census Bureau Response: The Census Bureau acknowledges this recommendation and will take it into consideration as we continue to test the validity and quality of administrative data.

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44. RECOMMENDATION: The NAC recommends that the Census Bureau examine proxy interview quality to determine how accurate it is, the race and ethnicity of the proxy respondent, and whether there are an indicia of quality issues with the information provided by the proxy respondent to include whether the respondent may have had an incentive to report false information.

Census Bureau Response: The Census Bureau partially accepts this recommendation. Based on the 2010 Post-Enumeration Survey (called the Census Coverage Measurement Survey), we released data that assessed the components of census coverage collected from proxy respondents in a manner that allowed direct comparison with the same information collected from householder respondents in NRFU and self-respondents via mail. See CCM Memo #G-01. We plan to do the same based on data from the 2020 PES.

However, when we collect census data on a nonresponding unit from a proxy respondent, we do *not* collect the race or ethnicity of *that proxy*. Therefore, such analysis is not possible. Further, we are not aware of any method that might indicate whether the proxy respondent may be reporting false information. We have a quality control procedure in place to alert us when a *Census Bureau interviewer* may be falsifying information, but not one focused on the respondent--whether proxy or householder.

VI. Post-Enumeration Survey Overview

The Post Enumeration Survey (PES) is the major source of data on race/ethnicity and the only source of data omissions. Because of correlation bias, the PES doesn't produce usable data for young children. In the 2010 Census, the net undercount for ages 0 to 4 when measured using Demographic Analysis was 4.6% but 0.7% using the PES.

45. RECOMMENDATION: The NAC recommends that the Bureau consult with the Census Scientific Advisory Committee, outside experts, or National Academy of Sciences to find effective ways to address the correlation bias in the PES as it relates to young children and households of color.

Census Bureau Response: The Census Bureau accepts this recommendation. At the March 18, 2021, meeting of the Census Scientific Advisory Committee, the planned correlation bias adjustment for the 2020 Post-Enumeration Survey was discussed, but no feasible alternatives have yet been suggested.

46. RECOMMENDATION: The NAC recommends that the Census Bureau release a public use file containing all data collected from the post-enumeration survey in order to allow replication of estimates of undercounts and overcounts.

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Census Bureau Response: The Census Bureau does not accept this recommendation. There are numerous concerns with creating public use files from the Post-Enumeration Survey. Currently there is no system to create public use files that protect the confidentiality of both census and Post-Enumeration Survey respondents. Additionally, the estimation methodology, which employs synthetic dual system estimation, can only support unbiased estimates for domains reported in the Post-Enumeration Survey reports.

47. RECOMMENDATION: The NAC recommends that the Census Bureau identify which geographic areas had the greatest percentage of low-quality responses (responses other than self-response or interview with a household respondent) and work with community partners in those areas to identify other sources of higher quality data that can be used to supplement data from the PES (e.g., tribal enrollment records, immigration and naturalization assistance records, etc.) to obtain a more accurate quality assessment.

Census Bureau Response: The Census Bureau does not accept this recommendation. The data collection period to collect addresses and people for the Post-Enumeration Survey is complete. Since clerical matching and follow-up has already begun, there is no way to enhance or add to the PES data and match it to the 2020 Census within the current timeline and system infrastructure.

48. RECOMMENDATION: The NAC recommends that the Census Bureau conduct a recall bias study of responses to the 2020 Census, as it did in the 2010 Census.

Census Bureau Response: The Census Bureau does not accept this recommendation. Given that the primary data collection operations for the Post-Enumeration Survey are complete, there is no way to retroactively collect the data necessary for a recall bias study. Furthermore, given that we are already a year from Census Day, any recall bias study that involves fieldwork would itself be subject to recall bias.

2020 Census Update Leave (U/L) households, largely rural, small and Tribal, as well as areas with low broadband access, were adversely affected during the 2020 Census when U/L operations were discontinued due to the COVID-1 pandemic and to conflicting guidance provided to U/L households by the Census Bureau on how to respond to the Census. The U/L universe comprised 6.8 million households, many of which were either not enumerated in during the decennial census or confused about how to participate due to conflicting Census guidance. It is imperative that some measurement of the Census Bureau's ability to count these households be ascertained and measured in any post census analyses undertaken.

49. RECOMMENDATION: The NAC recommends the Census include Update Leave households in the Post Enumeration Survey to determine how well the Census Bureau counted these populations in the 2020 Census.

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Census Bureau Response: The Census Bureau accepts this recommendation. The Post-Enumeration Survey includes Update Leave households from the 2020 Census and plans to produce coverage estimates for the Update Leave areas. These coverage estimates can be found in the tables reporting coverage by Type of Enumeration Area.

The 2020 Census Post Enumeration Survey is the primary mechanism for determining how well the Census Bureau performed in the Census, particularly enumerating historically undercounted populations. Given the heightened interest in the Census undercount due to a U.S. state's loss of a congressional seat because of 89 undercounted respondents from the 2020 Census apportionment release, the Census should use the release of the Post Enumeration Survey as an opportunity to introduce the PES to undercounted populations (and organizations representing them), to engage historically undercounted populations early on the importance of census participation and how well their areas responded to the census.

50. RECOMMENDATION: The NAC recommends that the Census broaden its engagement and do a better job of communicating Post Enumeration Survey results to historically undercounted populations including utilizing Census Information Centers to engage populations, national partners from the 2020 Census, and consult with the NAC on additional opportunities to broaden its outreach on PES results with these populations.

Census Bureau Response: The Census Bureau accepts this recommendation. We look forward to communicating the results of the Post-Enumeration Survey to a broad audience, including to historically undercounted populations. We look forward to specific recommendations from the NAC on how we can improve our engagement with undercounted populations on the PES results.

VII. Differential Undercount

As net undercounts of racial and ethnic groups have persisted for decades, and as omission rates are extraordinary for Black/African American and Hispanic households, in comparison to other populations the census should devote more research and internal technical resources to identifying methodological strategies to eliminate the Differential Undercount of racial and ethnic populations.

51. RECOMMENDATION: The NAC recommends the Census Bureau establish an internal technical working group to study the root causes of the differential undercount and develop methodological, technical and operational strategies to reduce/eliminate the differential undercount of race and ethnic populations in the 2030 Census.

Census Bureau Response: The Census Bureau finds this recommendation unnecessary. As part of our planned and usual research and implementation for the PES, each decade we assemble an estimation team that studies the most relevant issues

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related to census coverage, including the differential undercount among race groups, Hispanics and non-Hispanics, age groups (including children 0-4 years of age), and other demographic and geographic groups and domains. This team is composed of technical experts from several Census Bureau directorates. It interacts with and shares results with outside experts.

52. RECOMMENDATION: The NAC recommends that the Census Bureau explore opportunities to include an internal technical working group to study the root causes of the differential undercount (as explained above) in the 2030 research agenda, to include ethnographic research and survey research.

Census Bureau Response: The Census Bureau accepts this recommendation. We will consider this as we begin our planning for the 2030 Census.

VIII. Redistricting and Voting Rights Data Office

53. RECOMMENDATION: The NAC recommends that the Census Bureau more clearly communicate to the public the nature of the data that will be included in the “legacy” release scheduled for mid-August 2021.

Census Bureau Response: The Census Bureau accepts this recommendation, and we have already created and begun to use this messaging to communicate with stakeholders and the public on the nature of the legacy format summary files. These communications include public engagements, both virtual and in person. In addition, we are continuing to develop and publish support materials to assist data users with their use of these files.

54. RECOMMENDATION: The NAC recommends that the Census Bureau provide an online video to walk data users through the “legacy” data release, how to access it, and the online technical guides and tools to format it.

Census Bureau Response: The Census Bureau accepts this recommendation. This exact video was already planned and will be recorded and released in August.

55. RECOMMENDATION: The NAC recommends that in preparation for Census 2030 and any anticipated changes in the format of new files, and in the event of any disruption or delay to the publication of the PL 94-171 redistricting file, the Census Bureau be prepared to have a Legacy Format file ready for use at least 60 days prior to the publication of the PL 94-171 redistricting file.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

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56. RECOMMENDATION: The NAC recommends that for the 2030 Census, the Census Bureau consider the implications of providing alternative formats of race permutation tabulated data for the 2030 PL 94-171 redistricting file and report back to the NAC.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

IX. 2020 Census Data Products

57. RECOMMENDATION: The NAC recommends that the Bureau engage in scenario planning and communicate those plans to the NAC and the public about the Bureau's capacity to adjust disclosure avoidance procedures if ordered to so by a court.

Census Bureau Response: The Census Bureau acknowledges this recommendation but cannot comment at this time on any scenarios that might arise as a consequence of in-progress or future litigation.

The U.S. Census Bureau does not enumerate the LGBTQ population as individuals.

58. RECOMMENDATION: The NAC recommends a working group be formed on sexual orientation and gender identity for ACS purposes to discuss best practices for survey measurement for the LGBTQ populations.

Census Bureau Response: The Census Bureau thanks the NAC for recommending the formation of a working group focused on sexual orientation and gender identity (SOGI) and best practices for survey measurement for the LGBTQ populations. We will take it under consideration as we evaluate the results from the 2020 Census. The Census Bureau has been involved for many years with interagency collaborations on measuring SOGI and look forward to expanding our engagement with both federal and non-federal partners to identify and implement best practices for survey measurement of LGBTQ populations.

59. RECOMMENDATION: The NAC recommends that the Bureau continue to provide data at the block level in all 2020 Census products. These data are of high utility for research and other uses.

Census Bureau Response: The Census Bureau thanks the NAC for this recommendation and will consider it during planning for the remaining 2020 Census data products.

X. The Experimental Household Pulse Survey

The Household Pulse Survey (HPS) provides insight into the well-being of the respondent completing the survey, but not necessarily about the other people living in the household. The NAC applauds the Bureau for including the additional child-focused questions in the HPS 3.1 questionnaire. These questions (nutrition, health care, child

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care) will provide advocates with additional insight into how children and adults are weathering the pandemic. The NAC thanks the Bureau for its willingness to work and prioritize children.

Having said this, there is a lot that the Bureau can do to improve the HPS with respect to children. These data are centrally important to the priorities of this Administration, which has prioritized the needs of children and families.

At the moment the HPS only asks if there is a child under 18 in the household. This allows us to obtain insight into how households with children are faring, but not more than that. The needs of children and their parents differ significantly based on their age (i.e. child care issues for younger children; disconnection issues for older).

60. RECOMMENDATION: The NAC recommends that the Bureau ask in the HPS how many children are in each household; how many children are under five; how many are five to 12; and how many are 13 to 17 years old.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The Census Bureau accepts this recommendation in regards to asking about age ranges for children, albeit with a slight modification described here. Content changes for Phase 3.2, which is scheduled to launch late July 2021, will include a series of “yes/no” questions asking about the presence of children in the household under the age of 5 years, 5-11 years, and 12-17 years. These age ranges were recommended by CDC to align with the 12-17 year range currently recommended for the eligibility of children to receive the Pfizer vaccine.

With regard to questions about the mental health of children, the Census Bureau agrees that these are important data points. However, the HPS is designed to collect data from an adult respondent in the household, and in consultation with our Federal agency collaborators, we determined that data on children’s mental health status would not be reliable given the difficulty of ascertaining mental health status by proxy.

The HPS currently asks about the mental health needs of adults. The pandemic has hit children hard, having this data will help schools develop needed counseling and mental health supports for when school starts back up in the Fall.

61. RECOMMENDATION: The NAC recommends that the Bureau include questions in the HPS that assess the mental health of children.

Census Bureau Response: The Census Bureau partially accepts this recommendation. As noted in Recommendation #60 above related to mental health of children, the Census Bureau does not concur with the NAC recommendation for including questions on mental health of children in the HPS as the HPS is designed. In conjunction with the other

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Federal agencies, it was determined that proxy data collected by the adult in the household on the mental health status of children would not be of sufficient quality to merit the burden on the respondent.

Regarding the inclusion of child care questions, the Census Bureau concurs with the NAC's recommendation that the question offer a broader range of reasons for why a child did not attend daycare or other child care arrangement. We have accepted the NAC's wording suggested in Recommendation #62 below for inclusion in the Phase 3.2 HPS instrument. Phase 3.2 is scheduled to launch in late July 2021.

The NAC commends the Bureau for including questions about child care in the current HPS. However, the HPS currently asks about the implications of child care being "closed or unavailable" for parents. This fails to recognize that other reasons parents do not use child care during the pandemic is because they cannot afford it, or because they do not believe that it is safe.

62. RECOMMENDATION: The NAC recommends that in the question on page 30 of the HPS, "Which if any of the following occurred in the last 4 weeks as a result of child care being closed or unavailable," be amended to say "as a result of child care being closed, unavailable, unaffordable, or because you are concerned about your child's safety in care."

Census Bureau Response: The Census Bureau accepts the NAC's wording recommendation on the child care question and we have included it in the Phase 3.2 HPS instrument, which is scheduled to launch in late July, 2021.

63. RECOMMENDATION: The NAC recommends adding a question to the HPS regarding the factors affecting parent's access to care, allowing parents to check off as many as applied to their situation, including the new reasons listed in Recommendation 63. This question would go between the two existing child care questions.

Census Bureau Response: The Census Bureau does not accept this recommendation in planning for Phase 3.2. The NAC is correct that the HPS asks questions about preventive care for children, but it currently does not ask questions about preventive care for adults, nor specifically elder adults. We appreciate the recommendation and will put it forward for consideration in subsequent rounds of the questionnaire revision, working with our Federal agency partners and OMB to determine what content can be included while accounting for questionnaire length and associated burden on respondents.

The HPS asks about health care for the adult household member and preventative health care children in the household. However, the HPS does not address the need for preventative health care for elders living and being cared for in multi-generational households during the pandemic.

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64. RECOMMENDATION: The NAC recommends adding a battery of questions to the HPS regarding preventative health care for elders similar to the questions posed for children.

Census Bureau Response: The Census Bureau does not accept this recommendation. Please see response to Recommendation #63. The impending Phase 3.2 content, currently under review at OMB and scheduled to launch in late July does not include questions related to preventative health care for elders. The Census Bureau will consider the recommendation by the NAC in its negotiation for questionnaire content in subsequent phases.

As an experimental tool, the HPS lifespan was originally intended for just 12 weeks yet has been in field for over a year. Given the HFS is self-funded by the Census and has exceeded its intended duration funding may be a limitation for its continued operation.

65. RECOMMENDATION: The NAC recommends that the Census Bureau continue to fund (and request appropriate budget support, including any necessary increases for improvements) for the HPS in order to 1) support an Always On base level to maintain the platform and infrastructure require to further develop the tool and 2) build a budget reserve for increased operation in response to episodic events like Natural Disasters, Pandemic, and Wildfires.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The Census Bureau has been pleased with the broad and positive response to the HPS and the data it has provided throughout the pandemic. We have requested appropriated funds to support the survey starting in FY22, and we are conducting an evaluation starting in late June 2021 and throughout the summer to determine how the HPS can be designed to be a viable long-term vehicle for rapid turn-around data. We share the NAC's vision of an "Always On" instrument that can respond quickly to address information needs that support timely and effective program administration, policy development and response to urgent (sometimes catastrophic) events.

With regard to the second part of this recommendation, the Census Bureau concurs in part. The agency does not have the funding or time, given the rapid turnaround nature of the HPS, to conduct the coding operations needed to achieve the sub-group designations described. However, we have included in the questionnaire detailed categories for Asian and Hispanic, as well as write-ins for Other Hispanic, Black or African American, White, Other Asian, Other Pacific Islander and American Indian/Alaskan Native. These categories are in alignment with those included on the decennial census.

Since the HPS is experimental and we are seeing the disproportionality of the global pandemic and other natural disasters on families of color, it was good to see the HPS get more in-depth demographics about racial groups (e.g., Samoan, Vietnamese, etc.). There

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are differences within racial groups in many indicators from economic resources, vaccine access, child care, etc. However, we don't see such sub-group breakdown for Black/African Americans. As one of the largest racial groups in the U.S., it is critical to get this breakdown. In addition, it is estimated that at least 1 in 10 Black people are Black immigrants, making this detailed information critical as a reflection of the total Black population.

66. RECOMMENDATION: The NAC recommends that the Census Bureau explore categories for sub-group breakdown for Black/African Americans (e.g., Haitian, US Virgin Islands, Jamaican, Nigerian, Other Africa, etc.). We are able to do this for other minority racial groups so we should be able to do this for the Black group. We would like to see this same detail presented in the HPS and other products.

Census Bureau Response: The Census Bureau partially accepts this recommendation. Please see response to recommendation #65 above. The agency is constrained by the amount of time and funding it has available to do the requisite processing and coding to achieve the objectives for sub-group breakdown for Black/African Americans, while maintaining its character as a vehicle providing rapid response data. The HPS instrument nonetheless provides detailed response options for Asian and Hispanic, as well as a write-ins (specify) for Black or African American.

The Census Bureau concurs with the NAC's recommendation regarding the HPS response rate. We have conducted a preliminary non-response bias evaluation (<https://www.census.gov/programs-surveys/household-pulse-survey/technical-documentation.html#nonresp>), and we are exploring the use of administrative records to provide further insight into bias. Additionally, we are launching a comprehensive, end-to-end review of the HPS survey life cycle to determine where improvements can be made in the sample design, contact materials, instrumentation, and other features of the operation that can impact survey response.

Much of the presentation reports findings in the period after week 22, where the weighted response rates on findings reported are in the 6.4 to 7.5% range. Given the low response rate especially for a survey from a government agency, the NAC suggests withholding judgment on the proof of concept until the non-response bias study is done.

67. RECOMMENDATION: The NAC recommends a thorough and detailed non-response bias study. The non-response bias study should examine both unit non-response with respect to sampling bias and item non-response with respect to specific questions where there might be cultural barriers to responding to sensitive items like COVID positivity, mental health outcomes, benefits seeking behavior.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The agency has already completed a preliminary non-response bias study (available

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here:<https://www.census.gov/programs-surveys/household-pulse-survey/technical-documentation.html#nonresp>), and we are continuing to assess bias using administrative records. See also response to recommendation #66 above.

The Census Bureau understands but does not accept the second part of this recommendation. The agency appreciates that there are cultural and linguistic barriers to participating in Federal surveys. However, it does not currently have the resources to conduct the HPS in languages other than English and Spanish. At this time, between these two language options more than 98% of respondents opt to participate via the English instrument; less than 2% opt for the Spanish translation.)

In terms of HPS as a proof of concept, the Asian American community has the highest rates of limited-English proficiency, with rates above 50% for Vietnamese Americans and approximating 50% for other Southeast Asian as well as for Chinese, Korean, and Bangladeshi Americans. Language coverage can also bias estimates on measures such as mental health where there are obvious cultural barriers to reporting things like anxiety and depression. Moreover, along with language, cultural sensitivity and context plays a important role in the HPS.

68. RECOMMENDATION: The NAC recommends a close look at the relationship between language of interview, under-coverage, and non-response bias in the HPS.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The agency acknowledges that there are multiple dimensions to non-response, including language of interview; it is also challenging to understand the language barriers of non-responders as we don't know their characteristics given they didn't respond. That combined with the fact that utilization of the Spanish translation for HPS is extremely low (less than 2% of response), the Census Bureau will consider alternative ways to gauge under-coverage and non-response bias related to language of interview. One alternative we have considered preliminarily may be to look at geographic undercoverage and compare language use in those geographies to determine if there could be a correlation between non-response and high non-English use.

XI. Community Resilience Estimates (CRE)

69. RECOMMENDATION: The NAC recommends that dimensions of social, demographic and living conditions be incorporated and reported into ACS Factors/Flags to gauge disparate impact on individuals and households. This should include detailed information such as age, sex, race, ethnicity, and regions.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The modeling techniques currently used by the CRE do not support releasing estimates with the recommended detailed information which meet the statistical standards of the Census

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Bureau. The Census Bureau will research options in support of this recommendation and will explore development of datasets to provide auxiliary information which is relevant to the CRE.

70. RECOMMENDATION: The NAC recommends that a time frame for the public and community agencies be established to access these data. Develop a time frame and a process for the public and community agencies to access relevant data and information.

Census Bureau Response: The Census Bureau accepts this recommendation. The CRE program is in the process of removing the experimental label and becoming an official estimate of the Census Bureau. As part of this process, CRE will work to develop an annual release schedule that will be dependent on the release of the data used as model inputs for the CRE.

71. RECOMMENDATION: The NAC recommends that the Census Bureau increase its stakeholder engagement on the CREs to include setting up a NAC subcommittee and working with other interested stakeholders to develop and refine CREs.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau and the CRE team have been meeting with various federal agencies such as CDC and FEMA as well as state/local governments and academics. The Census Bureau is open to discussing a NAC subcommittee that would further assist in stakeholder engagement for the CRE.